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April 14, 2021

Via ECF

Honorable James J. Garrity, Jr.
U.S. Bankr. Ct. for the Southern Dist. of N.Y.
One Bowling Green
New York, NY 10004

Re: *In re Orly Genger*, Case No.: 19-13895-jlg

Dear Judge Garrity:

On behalf of Judgment Creditor Sagi Genger (“Sagi”), we respectfully write to seek enforcement of the Court’s bench rulings of March 5, 2021 and April 2, 2021 regarding the trustee of the Lily Dor Herschmann 2020 Lifetime Trust (the “Herschmann Trust”).

My colleague Mr. Pitta recently received an unsigned statement by regular mail (postmarked April 7) purporting to identify the Trustee of the Herschmann Trust. However, the President of the Trust’s subsidiary, Claims Pursuit, Inc., William McManus, denied, under oath, having even heard of this person. It was represented to us in the deposition that Mr. McManus knew the identity of the Trustee. In fact, Mr. Herschmann encouraged us to ask Mr. McManus who was *not* the Trustee, which we did and which resulted in the denial cited above.

We view this conduct as vexatious, and reserve the right to address it at a future juncture after we fully understand what has occurred. For now, we have repeatedly requested from Mr. Herschmann an unredacted copy of the underlying Trust Agreement (which was previously produced in redacted form) to reveal who was/is the Trustee. In fact, our proposed order included that request. Our requests have been ignored.

Accordingly, we respectfully request that the Court direct Mr. Herschmann to produce the unredacted Trust Agreement. We thank the Court for its consideration.

Respectfully,

A handwritten signature in blue ink, appearing to read "JD", followed by a horizontal line.

John Dellaportas

cc: All Counsel of Record (via ECF)